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State of California by and through California
Highway Patrol and Officer Ramon Silva

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SANDRA KIRKMAN AND
CARLOS ALANIZ,
INDIVIDUALLY AND AS
SUCCESSORS-IN-INTEREST TO
JOHN ALANIZ, DECEASED,

Plaintiff,

v.

STATE OF CALIFORNIA;
RAMON SILVA; AND DOES 1-10,
INCLUSIVE,

Defendant.

Case No.: 2:23-cv-07532-DMG-SSC

**DEFENDANTS STATE OF
CALIFORNIA BY AND THROUGH
CALIFORNIA HIGHWAY PATROL
AND OFFICER RAMON SILVA'S
NOTICE OF MOTION AND
MOTION IN LIMINE TO EXCLUDE
GRUESOME POST-INCIDENT AND
POST-MORTEM PHOTOGRAPHS**

[No. 2 of 4]

Courtroom: 8C
Judge: Hon. Dolly M. Gee

FPTC: March 25, 2025, 2:00 p.m.

Trial Date: April 15, 2025, 8:30 a.m.

**TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF
RECORD:**

PLEASE TAKE NOTICE that defendants State of California by and through California Highway Patrol and Officer Ramon Silva will move this Court in limine for an order excluding gruesome post-incident and post-mortem photographs depicting the decedent and his injuries. This motion is brought under Federal Rules of Evidence 401-43 and is based upon this notice, the memorandum of points and authorities, the pleadings, papers, and records on file herein, and such

1 other evidence and/or argument as the Court may accept at or prior to the hearing
2 on this motion.

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4 Dated: March 14, 2025

Dean Gazzo Roistacher LLP

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6 By: /s/ Lee H. Roistacher

7 Lee H. Roistacher
8 Attorneys for Defendants
9 State of California by and through
10 California Highway Patrol and
11 Officer Ramon Silva
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